

MAR 07 2018 PB

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

SANCHEZ LACKLAND  
(a/k/a "Chez"), and  
JERMOL MIXON  
(a/k/a "Yak")

17 CR 797

Violations: Title 18, United States Code,  
Sections 922(g)(1) and 924(c), and Title  
21, United States Code, Sections  
841(a)(1), 846, 952(a), 960(a)(1), and 963

**JUDGE DOW**

**MAGISTRATE JUDGE KIM**

**COUNT ONE**

The SPECIAL AUGUST 2017 GRAND JURY charges:

Beginning no later than on or about November 17, 2017, and continuing until  
at least on or about December 12, 2017, in the Northern District of Illinois, Eastern  
Division, and elsewhere,

SANCHEZ LACKLAND (a/k/a "Chez"),  
defendant herein, did conspire with Individual A and with others known and  
unknown to the Grand Jury, to knowingly and intentionally import into the customs  
territory of the United States from a place outside the United States, namely, China,  
a controlled substance, namely, 100 grams or more of a mixture and substance  
containing a detectable amount of methoxyacetyl fentanyl, an analogue of fentanyl  
(N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II  
Controlled Substance, in violation of Title 21, United States Code, Sections 952(a)  
and 960(a)(1);

All in violation of Title 21, United States Code, Section 963.

**COUNT TWO**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about November 19, 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANCHEZ LACKLAND (a/k/a "Chez"),

defendant herein, did knowingly and intentionally import into the customs territory of the United States from a place outside the United States, namely, China, a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of methoxyacetyl fentanyl, an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Sections 952(a) and 960(a)(1), and Title 18, United States Code, Section 2.

**COUNT THREE**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

Beginning no later than on or about November 17, 2017, and continuing until at least on or about December 12, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANCHEZ LACKLAND (a/k/a "Chez"),

defendant herein, did conspire with Individual A and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of methoxyacetyl fentanyl, an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846.

**COUNT FOUR**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about December 12, 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANCHEZ LACKLAND (a/k/a "Chez"),

defendant herein, did knowingly and intentionally attempt to possess with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of methoxyacetyl fentanyl, an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

**COUNT FIVE**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about December 12, 2017, at Hazel Crest, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANCHEZ LACKLAND (a/k/a "Chez"),

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; 100 grams or more of a mixture and substance containing a detectable amount of methoxyacetyl fentanyl, an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; and 100 grams or more of a mixture and substance containing a detectable amount of acryl fentanyl, an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT SIX**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about December 12, 2017, at Hazel Crest, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANCHEZ LACKLAND (a/k/a "Chez"),

defendant herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, namely, a loaded Taurus International Manufacturing Company, model Rossi 461, .357 S&W Magnum caliber revolver, bearing serial number EZ542613, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVEN**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about December 12, 2017, at Hazel Crest, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANCHEZ LACKLAND (a/k/a "Chez"),

defendant herein, did knowingly possess a firearm, namely, a loaded Taurus International Manufacturing Company, model Rossi 461, .357 S&W Magnum caliber revolver, bearing serial number EZ542613, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Five of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT EIGHT**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about December 12, 2017, at Orland Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

JERMOL MIXON (a/k/a "Yak"),

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of methoxyacetyl fentanyl, an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; 100 grams or more of a mixture and substance containing a detectable amount of acryl fentanyl, an analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT NINE**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about December 12, 2017, at Orland Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

JERMOL MIXON (a/k/a "Yak"),

defendant herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a loaded Para USA, Inc. Expert 14.45 .45 caliber pistol, bearing serial number K049355, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TEN**

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about December 12, 2017, at Orland Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

JERMOL MIXON (a/k/a "Yak"),

defendant herein, did knowingly possess a firearm, namely, a loaded Para USA, Inc. Expert 14.45 .45 caliber pistol, bearing serial number K049355, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Eight of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

## **FORFEITURE ALLEGATION**

The SPECIAL AUGUST 2017 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a).
2. In addition, defendants shall forfeit to the United States of America, any firearm and ammunition:
  - a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and
  - b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.
3. The property to be forfeited includes, but is not limited to: (a) approximately \$300,029 seized from 18024 Kedzie Avenue Apartment 202, Hazel Crest, Illinois, by law enforcement on or about December 12, 2017; (b) approximately \$9,500 seized from 16143 Hackney Drive, Orland Park, Illinois, by law enforcement

on or about December 12, 2017; (c) a Taurus International Manufacturing Company, model Rossi 461, .357 S&W Magnum caliber revolver, bearing serial number EZ542613, and associated ammunition; and (d) a Para USA, Inc. Expert 14.45 .45 caliber pistol, bearing serial number K049355, and associated ammunition.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY